

**IN THE UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: **Ruica Lesley Thomas-Gilliam** : **5:22-bk-01535-MJC**  
: Chapter 13  
:  
Debtor :

**OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN FILED BY  
A POCONO COUNTRY PLACE PROPERTY OWNERS ASSOCIATION**

Now comes A Pocono Country Place Property Owners Association, Inc. (the "Association") and objects to confirmation of the above Debtor's Chapter 13 plan, and in support thereof avers:

1. The plan cannot be confirmed since it fails to comply with 11 U.S.C. §1322, 11 U.S.C. §1325(a)(1), 11 U.S.C. §1325(a)(5)(B), L.B.R. 3015-4, for the reason that the Debtor has failed to properly take into consideration the Association's full secured claim.
2. The Association has a security interest in Debtor's real property located in the A Pocono Country Place planned community, Coolbaugh Township, Monroe County, PA. Said statutory lien was created pursuant to the Uniform Planned Community Act ("UPCA"), 68 Pa.C.S.A. § 5315 and also as a Judgment Lien at No. 3232 CV 2020 (Monroe County C.P.).
3. The Association's security interests totaled \$29,326.29 at the time the Petition was filed in this case. With interest over the life of the proposed plan, the Association's secured claim totals \$34,766.29.
4. Debtor's plan does not seek to pay the full amount of the secured claim but only seeks to pay \$26,000.00.

WHEREFORE, the Plan should be amended to include the full amount of the Association's claim.

YOUNG & HAROS, LLC  
/s/ NICHOLAS CHARLES HAROS, ESQ.  
NICHOLAS CHARLES HAROS, ESQ.  
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Attorneys for A Pocono Country Place Property Owners Association

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 30, 2022, I electronically filed the foregoing  
Objection with the Clerk of the Court and served said Objection upon all counsel of record  
via the Court's electronic filing system:

Timothy B. Fisher, II on behalf of Debtor 1 Ruica Lesley Thomas-Gilliam  
donna.kau@pocono-lawyers.com

Rebecca Ann Solarz on behalf of Creditor BANK OF AMERICA, N.A.  
bkgroup@kmllawgroup.com

United States Trustee  
ustpregion03.ha.ecf@usdoj.gov

Jack N Zaharopoulos (Trustee)  
TWecf@pamd13trustee.com

**The Objection was mailed to:**

PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541

YOUNG & HAROS, LLC

/s/ NICHOLAS CHARLES HAROS, ESQ.  
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